

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In Re: Dawn Marie Kandris  
Stephen Christopher Kandris

Case No: 14-35760  
Chapter 13

**AGREED STIPULATION OF FACTS**

COMES NOW, your Chapter 13 Trustee, by Counsel, and Jason Krumbein, Counsel for the Debtors and submit to the Court the following stipulations to be utilized by the Court in lieu of evidence as follows:

1. The parties filed a plan on August 25, 2015.
2. The plan was objected to and a new plan was filed on November 2, 2015.
3. The debtors were above median at the time of filing their Chapter 13 case.
4. The debtors have filed a 60 month plan.

Dated: February 25, 2016

Carl M. Bates  
Chapter 13 Trustee  
BY COUNSEL:

/s/Susan H. Call  
Susan H. Call  
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Richmond, Virginia 23218-1780  
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STATE BAR NUMBER: 34367

Dawn and Stephe Kandris  
Debtors  
BY COUNSEL:

/s/Jason Krumbein  
Jason Krumbein, Attorney at Law  
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